

**ROTHENBERG & CAMPBELL**

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*Attorneys for the Defendants*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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<b>PHILIP GODLEWSKI,</b>  <b>EDUARDO NICOLAS ALVEAR</b> <b>GONZALEZ, <i>aka</i> ALVEAR GONZALEZ</b> <b>EDUARDO NICOLAS, <i>aka</i></b> <b>NICOLAS ALVEAR; and</b> <b>GOOD LION TV, LLC,</b>	Plaintiff,  v.  Defendants	<b>CIVIL ACTION—LAW &amp; EQUITY</b> <i>(HON. JULIA K. MUNLEY)</i>  <b>JURY TRIAL DEMANDED</b>  No.: 3:24—CV—00344—JKM
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**DEFENDANTS' MOTION FOR AUTHORIZATION TO FILE BRIEF**  
**NOT TO EXCEED 8,500 WORDS PURSUANT TO LOCAL RULE 7.8(b)(3)**

AND NOW COME Defendants, Eduardo Nicolas Alvear Gonzalez, *aka* Alvear Gonzalez Eduardo Nicolas, *aka* Nicolas Alvear (collectively, “Individual Defendant”) and Good Lion TV, LLC (“Corporate Defendant”), by and through their counsel, Rothenberg & Campbell, and hereby moves this Honorable Court to authorize them to file a Brief in Support of their Motion to Dismiss First Amended Complaint Not to Exceed 8,500 words pursuant to Local Rule 7.8(b)(3), alleging as follows:

1. Plaintiff commenced the instant action by filing a Complaint against Defendants in the United States District Court for the Middle District of Pennsylvania on February 28,

2024. (See ECF Doc. No. 2).

2. On March 27, 2024, undersigned counsel entered his appearance for Individual Defendant and Corporate Defendant, having just been retained earlier that day by Defendants. (See ECF Doc. No. 11).

3. On April 4, 2024, Defendants filed their Motion to Dismiss Plaintiff's Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), and, Alternatively, Motion to Strick pursuant to Rule 12(f) ("First Motion to Dismiss"). (See ECF Doc. No. 16).

4. On or about April 6, 2024, this Honorable Court granted Plaintiff's Motion for Authorization to File Brief Not to Exceed 8,500 Words Pursuant to L.R. 7.8(b)(3) regarding the First Motion to Dismiss. (See ECF Doc. Nos. 17 and 18, *respectively*).

5. On April 25, 2024, Plaintiff filed a First Amended Complaint with this Honorable Court, rendering Defendants' April 4, 2024 Motion to Dismiss moot. (See ECF Doc. Nos. 22 and 23, *respectively*).

6. Defendants intend on filing a Motion to Dismiss First Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(6), in Whole or in Part, and, if Granted in Part, Motion to Dismiss Remaining Claims Pursuant to Fed R. Civ. P. 12(b)(1) ("Second Motion to Dismiss").

7. As of the date of this Motion, Defendants' Brief in Support of their Second Motion to Dismiss exceeds the word limit announced in Local Rule 7.8(b) with its current draft containing just under 9,000 words.

8. Defendants again seek authorization from this Honorable Court pursuant to Local Rule 7.8(b)(2) to file their Brief in Support of Second Motion to Dismiss with a word count not to exceed 8,500 words.

9. On May 7, 2024, Defendants' undersigned counsel contacted counsel for Plaintiff seeking concurrence in the instant motion for prior authorization to file their brief with a word count not to exceed 8,500 words; Plaintiff's counsel later concurred in his request.

**WHEREFORE**, for all of the reasons stated supra, Defendants, Eduardo Nicolas Alvear Gonzalez, *aka* Alvear Gonzalez Eduardo Nicolas, *aka* Nicolas Alvear, and Good Lion TV, LLC, by and through undersigned counsel, respectfully request that this Honorable Court **GRANT** their Motion for Authorization to File Brief Not to Exceed 8,500 Words Pursuant to Local Rule 7.8(b)(3).

Respectfully Submitted,

**ROTHENBERG & CAMPBELL**

By:

Ryan P. Campbell, Esquire  
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*ATTORNEYS FOR DEFENDANTS*

Date: May 7, 2024

**ROTHENBERG & CAMPBELL**

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*Attorneys for the Defendants*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**PHILIP GODLEWSKI,**

Plaintiff,

v.

**EDUARDO NICOLAS ALVEAR  
 GONZALEZ, AKA ALVEAR GONZALEZ  
 EDUARDO NICOLAS, AKA  
 NICOLAS ALVEAR; and  
 GOOD LION TV, LLC,**

Defendants

**CIVIL ACTION—LAW & EQUITY  
 (HON. JULIA K. MUNLEY)**

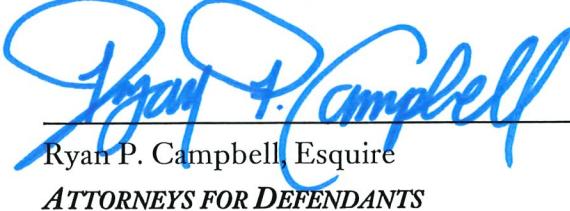
**JURY TRIAL DEMANDED**

No.: 3:24—CV—00344—JKM

**CERTIFICATE OF CONCURRENCE**

I, Ryan P. Campbell, Esquire, on behalf of Defendants, do hereby certify that I sought concurrence in Defendants' Motion for Authorization to File Brief Not to Exceed 8,500 Words Pursuant to Local Rule 7.8(b)(3) to Plaintiff's counsel, Timothy M. Kolman, Esq. by e-mail on May 7, 2024 and that Plaintiff's counsel has no objection to the instant motion.

BY: **ROTHENBERG & CAMPBELL**

  
 Ryan P. Campbell, Esquire  
 ATTORNEYS FOR DEFENDANTS

Date: May 7, 2024

**ROTHENBERG & CAMPBELL**

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 Dave W. Rothenberg, Esq. (#326483)  
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*Attorneys for the Defendants*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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<b>PHILIP GODLEWSKI,</b>  <b>EDUARDO NICOLAS ALVEAR</b> <b>GONZALEZ, AKA ALVEAR GONZALEZ</b> <b>EDUARDO NICOLAS, AKA</b> <b>NICOLAS ALVEAR; and</b> <b>GOOD LION TV, LLC,</b>	Plaintiff,  v.  Defendants	<b>CIVIL ACTION—LAW &amp; EQUITY</b> <i>(HON. JULIA K. MUNLEY)</i>  <b>JURY TRIAL DEMANDED</b>  No.: 3:24—CV—00344—JKM
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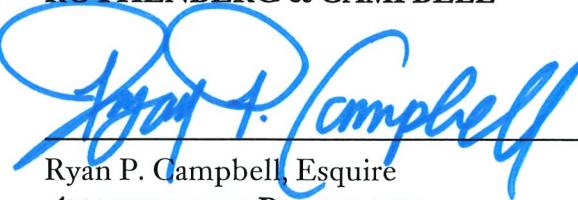
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**CERTIFICATE OF SERVICE**

I, Ryan P. Campbell, Esquire, on behalf of Defendants, do hereby certify that I sent a true and accurate copy of Defendants' Motion to Extend Deadlines in the above-captioned case on this **7<sup>th</sup> day of May, 2024** to the below named individuals by ECF and Electronic Mail addressed as follows:

Timothy M. Kolman, Esq.  
 e. [tkolman@kolmanlaw.com](mailto:tkolman@kolmanlaw.com)  
**ATTORNEYS FOR PLAINTIFF**

BY: **ROTHENBERG & CAMPBELL**



Ryan P. Campbell, Esquire  
**ATTORNEYS FOR DEFENDANTS**

DATE: MAY 7, 2024